

E-mail letter

April 14, 1999

To: Char Hauger and Steve Eggers, U.S. Army Corps of Engineers

From: Dan Cozza, Crandon Mine Project Manager, U.S. Environmental Protection Agency

RE: Crandon Mine Project: 94-01298-IP-DLB

I wish to follow-up on two issues that were discussed during yesterday's Crandon Mine COE Conference Call that were brought up by John Coleman, GLIFWC.

The first issue was regarding the need to install deeper wells in addition to the proposed shallow wells within the wetlands, as per the draft wetland monitoring plans by the COE and by Nicolet Minerals Company (NMC). John's reasoning was that these deep wells (some of the deeper wells already in existence could be used in some areas) are needed to help complete the picture on the wetland water budgets, stating that the information from these wells is as important as the information gathered from the weather stations. Regarding this issue, during the call, I asked if the COE had prepared Data Quality Objectives (DQOs) for this work, which could help others understand the scope and objectives of the wetland monitoring program. I very briefly explained what DQOs are and stated that having DQOs help plan for what kind of data is needed to obtain your objective. It was not mentioned during the call if the COE had prepared DQOs or not for this work, so to further my discussion on DQO's, I have attached a summary sheet on the DQO process. If this process applies to this project, I will leave that up to the COE, I only offer it up as a suggestion.

The second issue was regarding the wetland maps used within NMC's Environmental Impact Report (EIR). John stated that the wetlands have not been properly delineated within the EIR. He stated that in some cases wetlands were on the map but for the impact assessment, the wetlands were not shown. These missing wetlands range from less than an acre to between 30-40 acres in size. In bringing up this issue with EPA's EIS review staff, they were in agreement with what I stated during the call in that this issue needs to be resolved before accurate potential impacts of the project can be determined. The EPA EIS review staff asked if these maps have been ground truthed and if so, and the wetlands in the areas of question do exist and are not on the maps within the EIR, then this is important issue that needs to be addressed because it will affect site alternatives, delineation and mitigation determinations. Also, the avoidance, minimization and mitigation requirements may not be fully compliant with Section 404 of the Clean Water Act and the National Environmental Policy Act (NEPA). If the wetland mapping information is not correct within the EIR, it will be difficult to prepare an accurate EIS, but the COE could address shortcomings of the EIR within their EIS.

I hope this helps clarify EPA's stance on the two issues raised in the conference call yesterday, and I offer the above only in the interest of assisting you in the EIS process.

If you have an questions regarding the above, please give me a call at 312-886-7252.

attachment: DQO Process

cc: Conf call participants

